IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND NORTHERN DIVISION

STEPHEN A. DRAZIN,)
Plaintiff,)
v.) Case No.: 1:13-CV-02222-ELH
LINCOLN NATIONAL LIFE INSURANCE COMPANY; LINCOLN NATIONAL CORPORATION d/b/a LINCOLN NATIONAL LIFE INSURANCE COMPANY; and METROPOLITAN LIFE INSURANCE COMPANY,	(Removed from the Circuit Court) for Baltimore County, Case No. 03- C-13-006571 CN)
Defendants.)))

ANSWER

Defendants Lincoln National Life Insurance Company, Lincoln National Corporation, and Metropolitan Life Insurance Company (collectively "Defendants"), by and through their counsel of record, hereby answer the Complaint in this case as follows:

- 1. Admitted.
- Admitted that Lincoln National Corporation maintains its principle place of business in Pennsylvania. Otherwise denied.
- 3. Admitted that Lincoln National Life Insurance Company is registered to do business in Maryland and offers disability insurance policies. Otherwise denied.
- 4. Admitted by Metropolitan Life Insurance Company.
- 5. Admitted.

COUNT 1 - BREACH OF CONTRACT

1. Admitted that Plaintiff had a myocardial infarction and a triple bypass surgery on

or about March 19, 2002. Admitted that Plaintiff was an attorney whose practice

included family law. Otherwise denied.

2. Admitted that as of March 19, 2012 the Plaintiff had in force a contract of

disability insurance issued by Lincoln National Life Insurance Company and

administered by Metropolitan Life Insurance Company. Admitted that the

insurance contract contains a total disability provision and an Extended Own

Occupation Rider which defines total disability. Otherwise denied.

3. Denied.

4. Admitted.

5. Admitted that Plaintiff's claim for disability benefits was denied by Metropolitan

Life Insurance Company. Otherwise denied.

WHEREFORE, Defendants deny that Plaintiff is entitled to relief.

ADDITIONAL DEFENSES

1. Lincoln National Corporation denies that it is a party to the insurance contract.

Therefore, Lincoln National Corporation is not a proper party in this case.

2. Lincoln National Corporation was not properly served with the Complaint.

Dated: August 21, 2013 Respectfully submitted,

SUTHERLAND ASBILL & BRENNAN LLP

By: /s/ Thomas R. Bundy

Thomas R. Bundy (Bar No. 200012120078)

By: /s/ Wilson G. Barmeyer

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Attorney for Defendants Lincoln National Life Insurance Company, Lincoln National Corporation, and Metropolitan Life Insurance

Company

CERTIFICATE OF SERVICE

I ce	rtify that I	electronically	filed the	foregoing	document	using the	CM/ECF	System
which will	send notifi	cation of such	filing to	counsel of	f record.			

/s/ Thomas R. Bundy
Thomas R. Bundy